

1 FRANNY A. FORSMAN
Federal Public Defender
2 State Bar No. 000014
RAQUEL LAZO
3 Assistant Federal Public Defender
411 E. Bonneville Ave., Suite 250
4 Las Vegas, Nevada 89101
Tel: (702) 388-6577
5 Fax: (702) 388-6261
6 Attorney for **RODRIGUEZ-HERNANDEZ**

7
8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12 vs.
13 VICTOR MANUEL RODRIGUEZ-
14 HERNANDEZ,
15 Defendant.

2:13-cr-105-JCM-GWF

**UNOPPOSED MOTION TO ADVANCE
SENTENCING HEARING**

16 COMES NOW THE DEFENDANT, Victor Manuel Rodriguez-Hernandez, by and through
17 counsel, Rene L. Valladares, Federal Public Defender, and RAQUEL LAZO, Assistant Federal
18 Public Defender, counsel for VICTOR MANUEL RODRIGUEZ-HERNANDEZ, that the sentencing
19 hearing currently scheduled for Thursday, August 22, 2013 at the hour of 10:00 a.m. be advanced
20 to a date and time convenient to this court.

21 This Stipulation is entered into for the following reasons:

22 1. Defendant's Presentence Investigation Report has been completed. Probation has
23 recommended a sentence of credit for time served. This is consistent with the parties sentencing
24 agreement as delineated in the plea agreement.

25 2. The government has no opposition.

26 ///

27 ///

28 ///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DATED this 15th day of July, 2013.

Respectfully submitted,

RENE L. VALLADARES
Federal Public Defender

/s/ Raquel Lazo

By: _____
RAQUEL LAZO,
Assistant Federal Public Defender

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

2:13-cr-105-JCM-GWF

4 Plaintiff,

**PROPOSED ORDER TO ADVANCE
SENTENCING HEARING**

5 vs.

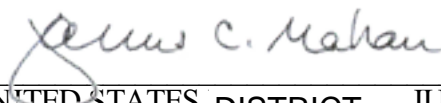
6 VICTOR MANUEL RODRIGUEZ-
7 HERNANDEZ,

8 Defendant.

9 **ORDER**

10 GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that the sentencing hearing
11 currently scheduled for Thursday, August 22, 2013 at the hour of 10:00 a.m. be advanced
12 to July 30, 2013 at the hour of 10:30 a.m.

13 DATED 25 day of July, 2013.

14 
15 _____
16 UNITED STATES DISTRICT JUDGE
17
18
19
20
21
22
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF ELECTRONIC SERVICE

The undersigned hereby certifies that I am an employee of the Law offices of the Federal Public Defender for the District of Nevada and am a person of such age and discretion as to be competent to serve papers.

That on July 15, 2013, she served an electronic copy of the above and foregoing **UNOPPOSED MOTION TO ADVANCE SENTENCING HEARING** by electronic service (ECF) to the person named below:

DANIEL BOGDEN
United States Attorney
333 Las Vegas Blvd. So., 5th Floor
Las Vegas, Nevada 89101
ROBERT A. BORK
Assistant United States Attorney
333 Las Vegas Blvd. So. 5th Floor
Las Vegas, NV 89101

/s/ Maribel Bran

Employee of the Federal Public Defender